

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

TODD TARGGART, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS, INC.,
KEN RICE, GEORGE PALIKARAS, ROBERT
L. COOK, CLIFTON DUBOSE, JR., JOSEPH
DEWOODY, LUCAS T. HAWKINS,
DELVINA OELKERS, MIA PITTS, KRISTIN
WHITLEY, and GREGORY MCCABE,

Defendants.

Case No. 1:24-cv-1927

**STIPULATION AND ORDER TO TRANSFER VENUE TO THE NORTHERN
DISTRICT OF TEXAS, FORT WORTH DIVISION**

Pursuant to 28 U.S.C. § 1404(a), Plaintiffs Todd Targgart, Steven Martinez, and Mohammed Limon and Defendants Next Bridge Hydrocarbons, Inc., Robert L. Cook, Clifton Dubose, Jr., Joseph DeWoody, Lucas T. Hawkins, Delvina Oelkers, Mia Pitts, Kristin Whitley, and Gregory McCabe hereby file this Stipulation and Order to Transfer Venue to the United States District Court for the Northern District of Texas, Fort Worth Division.

WHEREAS, Plaintiff Targgart filed the Complaint in this Court alleging federal securities claims against Defendants on March 15, 2024 (Dkt. No. 1);

WHEREAS, on August 3, 2024, the Court appointed Targgart, Martinez, and Limon as Lead Plaintiffs and set a deadline of August 19, 2024, for the Parties to meet and confer regarding the dates by when Lead Plaintiffs will file an amended complaint and Defendants will file a responsive pleading (Dkt. No. 23);

WHEREAS, on August 6, 2024, Defendants Next Bridge, Cook, DeWoody, Dubose, Hawkins, McCabe, Oelkers, Pitts, and Whitley filed a letter requesting a pre-motion conference to discuss their anticipated motion to transfer this action to the Northern District of Texas, Fort Worth Division (Dkt. No. 25);

WHEREAS, this action could have been brought in the Northern District of Texas under 28 U.S.C. § 1391(b) and 15 U.S.C. § 77v(a);

WHEREAS, the Parties agree that transferring this case to the Northern District of Texas is in the interests of fairness and the convenience of the Parties and witnesses;

WHEREAS, the Parties wish to transfer venue of this case to the Northern District of Texas to avoid the additional attorneys' fees and costs that would be incurred through further briefing and argument of a motion;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

1. Venue is proper in and this case should be transferred to the United States District Court for the Northern District of Texas, Fort Worth Division; and
2. The August 19, 2024 deadline for the Parties to meet and confer regarding the case schedule is adjourned pending transfer.

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Hydrocarbons, Inc., Robert L. Cook, Clifton
Dubose, Jr., Joseph DeWoody, Lucas T.
Hawkins, Delvina Oelkers, Mia Pitts, Kristin
Whitley, and Gregory McCabe*

SO ORDERED this 12 day of
August 2024:

/S/ Frederic Block

Frederic Block, U.S.D.J